

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

THOMAS GORCZYNSKI, <i>Individually and on behalf of others similarly situated,</i> Plaintiff, v. ELECTROLUX HOME PRODUCTS, INC., et al., Defendants.	Case No. 1:18-cv-10661-RMB-AMD CERTIFICATION OF RAINA C. BORRELLI, ESQ. IN SUPPORT OF APPLICATION FOR <i>PRO HAC VICE</i> ADMISSION
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RAINA C. BORRELLI, of full age, certifies as follows:

1. I am a member of the law firm Gustafson Gluek PLLC, located at Canadian Pacific Plaza, 120 South Sixth Street, Suite 2600, Minneapolis, MN 55402. I respectfully submit this Certification in support of my application for admission *pro hac vice* to this Court pursuant to Local Civil Rule 101.1 on behalf of Plaintiff Thomas Gorczynski, individually, and on behalf of all others similarly situated (the “Plaintiffs”) in the above matter.

2. As required under Local Civil Rule 101.1(c), I am a member in good standing of the bar of the State of Minnesota and was admitted to practice in that jurisdiction on October 28, 2011. (A copy of my Certificate of Good Standing, dated January 16, 2020, from the State of Minnesota is attached as Exhibit A).

3. I am also a member in good standing with the following additional courts: the United States District Court for the District of Minnesota and United States District Court for the Eastern District of Wisconsin.

4. I am not under suspension or disbarment by any court.

5. My firm and I have been requested by Plaintiffs to represent them in connection with this litigation because I have substantial experience in civil litigation, including consumer law and class action litigation. I believe that my expertise makes me particularly qualified to represent Plaintiffs and a class of similarly situated individuals.

6. I am associated in this matter with the New Jersey law firm of Saltz, Mongeluzzi & Bendesky, PC and Simon Bahne Paris, Esq. of that firm, who is admitted to practice law in the State of New Jersey and this Court.

7. I designate the following member of the Bar of this Court with whom the Court and opposing counsel may communicate regarding this case: Simon Bahne Paris, Saltz, Mongeluzzi & Bendesky, PC, One Liberty Place, 1650 Market Street, 52nd Floor, Philadelphia, PA 19103. I shall have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in this State.

8. No delay in discovery, motions, trial, or any other proceeding shall occur or be requested by reason of my inability to be in attendance.

9. I agree to strictly observe the dates fixed for scheduling conferences, motions, briefs, pre-trial conferences, trial, or other proceedings.

10. If admitted *pro hac vice*, I will adhere to the disciplinary jurisdiction of this Court. I also consent to the appointment of the Clerk of the Supreme Court of the State of New Jersey as agent upon whom service of process may be made for all actions against me or my law firm that may arise out of my participation in this matter.

11. I will arrange with the New Jersey Lawyer's Fund for Client Protection for payment of the applicable annual fee and shall pay the \$150.00 fee required by Local Civil Rule 101.1(c)(3) upon my admission *pro hac vice*.

12. I shall notify this court immediately of any matter affecting my standing at the bar of any other court.

13. Should the Court grant this application to appear *pro hac vice*, I will abide by all the requirements outlined in Local Civil Rule 101.1(c).

14. I therefore respectfully request that the Court grant my application for *pro hac vice* admission in this matter.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 13, 2020



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